

(SPACE BELOW FOR FILING STAMP ONLY)

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ATTORNEYS FOR Defendant,  
TERRANCE JOHN COX

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiffs,

v.

TERRANCE JOHN COX,

Defendants.

Case No: **1:22-cr-00214-NODJ-BAM**

**AMENDED STIPULATION AND  
PROTECTIVE ORDER BETWEEN THE  
UNITED STATES AND DEFENDANT**

WHEREAS, the discovery in this case is voluminous and contains a large amount of personal and confidential information including but not limited to dates of birth, telephone numbers, residential addresses, social security numbers and other confidential information (“Protected Information”); and

WHEREAS, the parties desire to avoid both the necessity of large scale redactions and the unauthorized disclosure or dissemination of this information to anyone not a party to the court proceedings in this matter;

The parties agree that entry of a stipulated protective order is appropriate.

THEREFORE, Defendant TERRANCE JOHN COX, by and through his counsel of record (“Defense Counsel”), and the United States of America, by and through Assistant United States Attorney Jeffrey A. Spivak, hereby agree and stipulate as follows:

1        1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of  
2 Criminal Procedure, and its general supervisory authority.

3        2. This Order pertains to all discovery provided to or made available to Defense Counsel as  
4 part of discovery in this case (hereafter, collectively known as “the discovery”).

5        3. By signing this Stipulation and Protective Order, Defense Counsel agrees not to share any  
6 documents that contain Protected Information with anyone other than Defense Counsel attorneys,  
7 designated defense investigators, and support staff. Defense Counsel may permit the Defendant  
8 to view unredacted documents in the presence of his attorney, defense investigators, and support  
9 staff. The parties agree that Defense Counsel, defense investigators, and support staff may  
10 provide the Defendant with copies of documents from which Protected Information has not been  
11 redacted for the purposes of preparing for Sentencing. Defendant agrees to not disseminate,  
12 verbally, physically or in writing, any information contained within the documents, other than to  
13 his attorney **and others directly engaged by and working on his attorney’s behalf (to include**  
14 **defense investigators, experts, and support staff).**

15        4. To the extent possible, to alleviate the time burden associated with defense counsel  
16 redacting Protected Information to give defendant copies of discovery documents, the  
17 government will endeavor to identify categories of documents and/or Bates ranges of produced  
18 discovery documents that may be provided to the defendant for temporary review without  
19 redaction.

20        5. The discovery and information therein may be used only in connection with the litigation  
21 of this case and for no other purpose. The discovery is now and will forever remain the property  
22 of the Government. Defense Counsel will return the discovery to the Government or certify that  
23 it has been shredded at the conclusion of the case.

24        6. Defense Counsel will store the discovery in a secure place and will use reasonable care to  
25 ensure that it is not disclosed to third persons in violation of this agreement.

26        7. Defense Counsel shall be responsible for advising the Defendant, employees, and other  
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members of the defense team, and defense witnesses of the contents of this Stipulation and Order.

8. In the event that Defendant substitutes counsel, undersigned Defense Counsel agrees to withhold discovery from new counsel unless and until substituted counsel agrees also to be bound by this Order.

IT IS SO STIPULATED.

Dated: February 18, 2025.

Respectfully submitted,

LAW OFFICE OF MARK W. COLEMAN

/s/ Mark W. Coleman

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MARK W. COLEMAN  
Attorney for Defendant  
TERRANCE JOHN COX

Dated: February 18, 2025.

UNITED STATES ATTORNEY'S OFFICE

/s/ Jeffrey Spivak

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JEFFREY SPIVAK  
Assistant United States Attorney

### **ORDER**

The amended stipulated protective order, modifying Doc. 15, is hereby approved.

IT IS SO ORDERED.

Dated: February 18, 2025

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE